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Counsel for Plaintiffs
 ELECTROGRAPH SYSTEMS, INC. and
 ELECTROGRAPH TECHNOLOGIES CORP.

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

In re: TFT-LCD (FLAT PANEL)
 ANTITRUST LITIGATION

This Document Relates To Individual Case No.
 3:11-cv-03342-SI (N.D. Cal.)

ELECTROGRAPH SYSTEMS, INC.;
 ELECTROGRAPH TECHNOLOGIES
 CORP.,

Plaintiffs,

vs.

NEC CORPORATION;
 NEC CORPORATION OF AMERICA;
 NEC DISPLAY SOLUTIONS OF
 AMERICA, INC.;
 NEC ELECTRONICS AMERICA, INC.;
 NEC LCD TECHNOLOGIES, LTD.,

Defendants.

Case No. 3:11-cv-03342-SI (N.D. Cal.)

Master File No. 3:07-md-01827-SI (N.D. Cal.)

MDL No. 1827

**DECLARATION OF PHILIP J. IOVIENO
 IN SUPPORT OF ELECTROGRAPH
 SYSTEMS, INC.'S AND ELECTROGRAPH
 TECHNOLOGIES CORP.'S OPPOSITION
 TO NEC DEFENDANTS' MOTION TO
 CERTIFY**

**DOCUMENT SUBMITTED UNDER
 SEAL**

1 I, **PHILIP J. IOVIENO**, declare as follows:

2 1. I am a partner at the law firm of Boies, Schiller & Flexner LLP, counsel for
3 plaintiffs Electrograph Systems, Inc. and Electrograph Technologies Corp. (collectively,
4 “Electrograph”), and am licensed to practice law in the State of New York and admitted to practice
5 *pro hac vice* before this Court. Except for those matters stated on information and belief, which I
6 believe to be true, I have personal knowledge of the facts stated herein, and, if called as a witness,
7 I could and would competently testify thereto.

8 2. Attached hereto as Exhibit A is a true and correct copy of portions of the deposition
9 transcript of H.S. Kim, which is designated as HIGHLY CONFIDENTIAL by defendant Samsung
10 Electronics Co., Ltd.

11 I declare under penalty of perjury that the foregoing is true and correct.

12 Executed this 24th day of February, 2012, at Albany, NY.

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14 /s/ Philip J. Iovieno
Philip J. Iovieno
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